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UNITED STATES BANKRUPTCY COURT

DISTRICT OF UTAH

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In re

NEIL A HAUCH,  
Debtor.

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NEIL A HAUCH,

Plaintiff,

V.

UNITED STATES DEPARTMENT OF  
EDUCATION,

Defendant.

Bankruptcy No. 23-20128

Chapter 7

Adversary Proceeding No. 23-02021

Judge Kevin R. Anderson

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**UNITED STATES DEPARTMENT OF EDUCATION’S SECOND STIPULATED  
MOTION  
FOR AN EXTENSION OF TIME TO ANSWER COMPLAINT**

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The United States Department of Education hereby stipulate with Neil A Hauch, and hereby move for additional time of ninety days up to March 18, 2024, to respond to Plaintiff/Debtor’s Complaint for Discharge of Student Loans (“Complaint”).

Plaintiff/Debtor Neil A Hauch commenced this Bankruptcy action naming the U.S. Department of Education as a Defendant/Creditor on January 16, 2023. A Complaint was filed on April 17, 2023. The Court has granted one previous continuance to answer the Complaint. The U.S. Department of Education's Answer is currently due on December 18, 2023. As basis for the extension of time, the undersigned attorney for the United States Attorney's Office has communicated with the U.S. Department of Education to obtain information to answer this Complaint. The U.S. Department of Education has provided records and information related to the Debtor and has requested additional information from the Debtor.

The Debtor has agreed to provide the additional information requested and a packet has been sent to the Debtor to facilitate the exchange of the requested information. Once received the U.S. Department of Education will need additional time to evaluate the information which will be received from the Debtor to determine if dischargeability is appropriate in this case. The Debtor has not yet completed the packet of information but has agreed to provide this information to the United States. The United States and Debtor therefore stipulate to this continuance of time for the U.S. Department of Education obtain and review these records prior to the filing of the Answer.

WHEREFORE, Plaintiff/Debtor Neil A Hauch, and the Defendant U.S. Department of Education, hereby stipulate and move that the U.S. Department of Education may have until March 18, 2024, to respond to Plaintiff/Debtor's Complaint for Discharge of Student Loans.

A proposed order for enlargement of time is submitted herewith.

Dated this 14<sup>th</sup> Day of December 2023.

TRINA A. HIGGINS  
United States Attorney

/s/ Richard W. Daynes  
RICHARD W. DAYNES  
Assistant United States Attorney

STOKES LAW PLLC

/s/ Ted F. Stokes  
TED F. STOKES  
Attorney for Plaintiff/Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing STIPULATED MOTION FOR AN EXTENSION OF TIME TO ANSWER COMPLAINT was caused to be served on all persons named below by electronic filing notice on December 14, 2023.

Plaintiff/Debtor:

Ted F. Stokes  
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/s/ Richard W. Daynes  
RICHARD W. DAYNES